

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Darryl Brown

Case: 2:21-mj-30473

Assigned To : Unassigned

Case No. Assign. Date : 10/4/2021

Description: CMP USA v. BROWN
(SO)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

Task Force Agent Angela Bunch, A.T.F.

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 4, 2021

City and state: Detroit, Michigan



Judge's signature

Hon. Jonathan Grey, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Angela Bunch, being duly sworn, depose and state the following:

I. INTRODUCTION

1. I am a member of the Detroit Police Department and have been for twenty-three years. Since 2013, I have been assigned to the Firearms Investigative Team with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I became a Task Force Officer with the ATF in May of 2014. I have a Bachelors of Applied Science. I have been involved in numerous investigations related to violations of federal firearm and narcotic laws.

2. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. I am currently investigating Darryl BROWN, date of birth xx/xx/1976, for being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

4. I reviewed a computer printout of BROWN’s criminal history (“CCH”). BROWN has the following convictions:

- a. 1997 – felony – Home invasion 1st degree; and, felony – malicious destruction of building over \$100 - 3rd Circuit Court, Wayne County, Detroit;
- b. 2001 – felony – weapons, carrying concealed – 3rd Circuit Court, Wayne County, Detroit;

- c. 2001 – attempt felony – weapons, carrying concealed – 3rd Circuit Court, Wayne County, Detroit;
- d. 1999 – felony – stolen property, receiving / concealing – 3rd Circuit Court, Wayne County, Detroit;
- e. 2010 – felony – assault with intent to do great bodily harm less than murder or by strangulation; and, felony – witnesses, bribing / intimidating / interfering - 3rd Circuit Court, Wayne County, Detroit;
- f. 2017 – felony- domestic violence – aggravated; 3rd Circuit Court, Wayne County, Detroit;
- g. 2018 – felony – unlawful imprisonment; 3rd Circuit Court, Wayne County, Detroit.

II. SUMMARY OF THE INVESTIGATION

5. On September 1, 2021, at approximately 5:20p.m., Detroit police officers were on routine patrol in the 9th precinct. While at the corner of Fordham and Hayes, they observed a male, later identified as Darryl BROWN. BROWN had a large extended magazine sticking out of his pant pocket. Recognizing the magazine to belong to a firearm, they stopped to investigate.

6. Officers exited their scout car and approached BROWN, asking if he had a CPL (concealed pistol license) to carry a firearm. BROWN stated he did, and began to look in his vehicle for the paperwork. BROWN was unable to produce a CPL. The firearm was removed from his pocket and made safe. Per LEIN (law enforcement information network), BROWN does not have a concealed pistol license, and the firearm he was carrying was reported stolen.

7. BROWN was arrested and conveyed to the Detroit Detention Center for processing.

8. The recovered firearm is a Glock, model 26, 9mm semiautomatic handgun.

9. I contacted ATF Special Agent Michael Jacobs, an expert in the Interstate Nexus of firearms. Agent Jacobs stated that the firearm, based on the description provided, without physically examining it, was manufactured outside the State of Michigan and therefore traveled in and affected interstate commerce.

10. BROWN is currently on parole with the Michigan Department of Corrections. BROWN has also entered several guilty pleas to felony charges. Therefore, probable cause exists that BROWN was aware that he was a convicted felon at the time of this arrest, and cannot possess firearms.

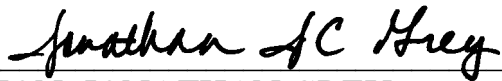
III. CONCLUSION

11. Probable cause exists that Darryl BROWN, a convicted felon, did knowingly and intentionally possess a firearm, which traveled in and affected interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).



Task Force Officer Angela R. Bunch
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my
Presence and/or by reliable electronic means.



HON. JONATHAN GREY
UNITED STATES MAGISTRATE JUDGE